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Amazon Logistics, Inc.

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re:

SCOOBEEZ, et al.¹,

Debtors and Debtors in
Possession.

SCOOBEEZ, INC.,

Plaintiff

v.

AMAZON LOGISTICS, INC.,

Defendant.

Case No. 2:19-bk-14989-WB
Jointly Administered:
2:19-bk-14991-WB, and 2:19-bk-14997-WB

Chapter 11

Adv. No. 2:19-ap-01456-WB

**AMAZON LOGISTICS, INC.'S
EVIDENTIARY OBJECTIONS RE
MOTION FOR PRELIMINARY
INJUNCTION**

Date: November 18, 2019
Time: 10:00 a.m.
Place: United States Bankruptcy Court
Edward Roybal Federal Building
255 E Temple St., Ctrm 1375
Los Angeles CA 90012

Pursuant to the provisions of Local Rule 9013-1(i)(2), Defendant, Amazon Logistics, Inc., (“**Amazon Logistics**”), respectfully submits the following evidentiary objections to the declarations submitted by Plaintiff, Scoobeez, Inc. in support of its motion for a preliminary injunction herein and requests that the Court strike the following portions of those declarations:

¹ The Debtors and the last four digits of their respective federal taxpayer identification numbers are as follows: Scoobeez (6339); Scoobeez Global, Inc. (9779); and, Scoobur, LLC (0343). The Debtors’ address is 3463 Foothill Boulevard, in Glendale, California 91214.

Declaration of Brian Weiss

(Docket No. 2, pages 22-23)

Objected to Portion of Declaration	Basis of Objection
¶ 9 "... Amazon knowingly allowed the Debtors to proceed with a sale process that was based, at least in part, on an expectation of ongoing business with Amazon."	Fed.R.Evid. 602: There is no foundation that Mr. Weiss has personal knowledge as to Amazon's state of mind regarding the Debtors' sale process.

Declaration of George Voskanian

(Docket No. 2, pages 24-25)

Objected to Portion of Declaration	Basis of Objection
¶ 7 "Some employees have raised the issue that Amazon employees are directly saying that Scoobeez is on its way out, therefore, routes will be shaved off overtime (<i>sic</i>)."	Fed.R.Evid. 602 and 802: To the extent that this statement is being offered to prove the content of communications by Amazon employees, there is no foundation that Mr. Voskanian has personal knowledge as to the content of those communications. As a result, the statement is inadmissible hearsay.

Declaration of George Voskanian

Docket No. 21, pages 6-7)

Objected to Portion of Declaration	Basis of Objection
¶ 8 "On a number of occasions, Scoobeez employees have reported being told by Amazon employees that Scoobeez routes are being reduced."	Fed.R.Evid. 602 and 802: To the extent that this statement is being offered to prove the content of communications by Amazon employees, there is no foundation that Mr. Voskanian has personal knowledge as to the content of those communications. As a result, the statement is inadmissible hearsay.

1 Dated: November 11, 2019

MORGAN, LEWIS & BOCKIUS LLP

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3 By: /s/ Richard W. Esterkin
4 Richard W. Esterkin

5 Attorneys for Amazon Logistics, Inc.
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CERTIFICATE OF SERVICE FORM
FOR ELECTRONIC FILINGS

I hereby certify that on November 11, 2019, I electronically filed the foregoing document,
Amazon Logistics, Inc.'s Evidentiary Objections re: Motion For Preliminary Injunction
with the Clerk of the United States Bankruptcy Court, Central District of California, Los Angeles
Division, using the CM/ECF system, which will send notification of such filing to those parties
registered to receive notice on this matter.



Renee Robles